

Michael T. Kitson, WSBA No. 41681

Sean D. Jackson, WSBA No. 33615

Riley R. Moyer, WSBA No. 56243

LANE POWELL PC

1420 Fifth Avenue, Suite 4200

P.O. Box 91302

Seattle, Washington 98111-9402

Telephone: 206.223.7000

Facsimile: 206.223.7107

kitsonm@lanepowell.com

jacksons@lanepowell.com

moyerr@lanepowell.com

Attorneys for Defendant, Spokane County

HONORABLE SALVADOR

MENDOZA JR.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
AT SPOKANE

ANDREW M. RICHMOND, a  
Washington Resident,

Plaintiff,

v.

SPOKANE COUNTY,  
WASHINGTON, a Washington State  
County,

Defendant.

No. 2:21-cv-00129-SMJ

**JOINT STATUS REPORT RE  
PROPOSED DATES AND  
DEADLINES**

At the Court's request (ECF No. 111), the parties hereby submit this Joint  
Status Report proposing a new trial date and proposed pre-trial deadlines:

## **I. PROPOSED TRIAL DATE AND PRE-TRIAL DEADLINES**

The parties have agreed on a proposed trial date of March 6, 2023<sup>1</sup>. The proposed deadlines from the Amended Case Schedule (ECF No. 70) that have not passed are keyed off of the trial date in similar increments as the deadlines under the Amended Case Schedule.

Deadline for parties to file (stipulated or separate) motion seeking additional discovery	November 4, 2022
Witness and exhibit lists:	
Supplemental lists (if any) filed and served: <sup>2</sup>	January 6, 2023
Objections filed and served:	January 13, 2023

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<sup>1</sup> Defendants' counsel is currently set to be in trial in Spokane County Superior Court from November 28, 2022 through the end of January 2023.

<sup>2</sup>The parties previously filed and served witness and exhibit lists on August 12, 2022 pursuant to the Court's Amended Scheduling Order. ECF No. 70. The parties agree that the prior witness and exhibit lists should be the operative witness and exhibit lists, but the parties also agree there may be a need to designate additional witnesses or exhibits if additional relevant evidence is determined through additional discovery.

Deposition designations:	
Any supplemental designated transcripts served: <sup>3</sup>	January 6, 2023
Cross-designations served:	January 20, 2023
Objections filed and served:	January 27, 2023
All motions <i>in limine</i> filed	January 13, 2023
Joint Proposed Pretrial Order filed and emailed to the Court	January 18, 2023
Confer with Courtroom Deputy regarding JERS	1 Week Before Pre-trial Conference
<b>PRETRIAL CONFERENCE</b>	February 7, 2023
Trial briefs, jury instructions, verdict forms, requested <i>voir dire</i> , and list of exhibits admitted without objection, filed, and emailed to the Court	February 24, 2023
Exhibits for Trial	2 Weeks Before Trial
<b>FINAL PRETRIAL CONFERENCE</b>	March 6, 2023 - 9:30 am
<b>JURY TRIAL</b>	March 6, 2023 – 9:00 am

<sup>3</sup> The parties previously filed and served deposition designations pursuant to the Court's Amended Scheduling Order. ECF No. 70. The parties agree that no additional deposition testimony from depositions that were previously taken can be designated. However, if additional depositions are conducted, the parties agree that they should be permitted to designate additional deposition testimony.

1 Dated this 19<sup>th</sup> day of August 2022.

2 BARDEN & BARDEN

BLOOM LAW PLLC

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4  
5 By: s/Heather C. Barden

6 Heather C. Barden, WSBA No. 49316  
7 P.O. Box 8663  
8 Spokane, WA 99203  
9 Telephone: 509.315.8089  
10 heather@bardenandbarden.net  
11 *Attorneys for Plaintiff*

By: s/Jay Corker Free

Beth Bloom, WSBA No. 31702  
Jay Corker Free, WSBA No. 51393  
3827-C South Edmunds Street  
Seattle, WA 98118  
Telephone: 206.323.0409  
jfree@bloomlawpllc.com  
bbloom@bloomlawpllc.com  
*Attorneys for Plaintiff*

12 LANE POWELL PC

13  
14 By: s/Michael T. Kitson

15 Michael T. Kitson, WSBA No. 41681  
16 Sean D. Jackson, WSBA No. 33615  
17 Riley R. Moyer, WSBA No. 56243  
18 1420 Fifth Avenue, Suite 4200  
19 P.O. Box 91302  
20 Seattle, Washington 98111-9402  
21 Telephone: 206.223.7000  
22 kitsonm@lanepowell.com  
23 jacksons@lanepowell.com  
24 moyerr@lanepowell.com  
25 *Attorneys for Defendant, Spokane County*